

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c) <b>Eric J Clayman, Esquire</b> <b>Jenkins &amp; Clayman</b> 412 White Horse Pike Audubon, NJ 08106 (856) 546-9696 Attorney for Debtors
In Re:  Lisa Williams, Debtors

Case No.: 15-30135

Judge: JNP

Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**

- ☒ **CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**  
☐ **TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned Chapter 13 proceeding hereby objects to the following (choose one):

1. ☒ Motion for Relief from the Automatic Stay filed by Fay Servicing, LLC creditor.

A hearing has been scheduled for January 22, 2019

OR

- ☐ Motion to Dismiss filed by the Standing Chapter 13 Trustee,

A hearing has been scheduled for \_.

- ☐ Certification of Default filed by \_\_\_\_\_, creditor

I am requesting a hearing be scheduled in this matter.

OR

- ☐ Certification of Default filed by Standing Chapter 13 Trustee.

I am requesting a hearing be scheduled in this matter.

2. I am objecting to the above for the following reasons (**choose one**):

☐ Payments have been made in the amount of \$\_\_\_\_\_, but have not been accounted for. Documentation in support of attached hereto.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):\_\_\_\_\_

☒ Other (**explain your answer**): I do not agree with the mortgage company accounting and believe I may owe for December 2018. The alleged payment default related to payment in 2017 when I would go to Bank of America and pay Bank of America In person, I am going to need 30 days to find proof of these payments. I have not yet paid my December 2018 payment (due to this motion) but will pay it by the end of January and will pay January's and February's installment shortly thereafter.

3. This Certification is being made in an effort to resolve the issues raised by the creditor in this motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 1/14/2019

/s/Lisa Williams

Lisa Williams, debtor

NOTE:

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss*.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within ten (10) days of the filing of a *Creditor's Certification of Default* (under an *Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions*) or a *Trustee's Certification of Default*.

**If this form is not filed the Motion or Certification of Default will be deemed uncontested and no hearing will be scheduled.**